REMARKS

CLAIM OBJECTIONS

5 Claim 2 has been amended to overcome the objection.

CLAIM REJECTIONS UNDER 35 USC 102

With respect to claims 13 and 14, applicant submits that reference number 306 of FIG. 3B of Lin does not show a 10 trench, as posited by the PTO, but rather a via, as stated in the text of Lin. Accordingly, the result is not a "vertical planar conductive feature" (emphasis added) as recited in paragraph (b) of claim 13, but rather a plated via, something already common in the art. This is 15 an important distinction, because a vertical planar conductive feature can serve a connective function between features on different levels of a multilevel circuit, in a manner that can not be achieved by currently available technology, which includes the use of 20 plated vias. For example, in some instances insufficient real estate is available to route a trace having horizontal width, but a vertical trace (i.e. a vertical planar conductive feature) could be used. Claim 14 is 25 patentably distinct over the prior art because it depends on claim 13, which is patentably distinct over the prior art.

It is respectfully submitted that the claims are now in condition for allowance. Reconsideration and early notice of allowance are respectfully solicited.

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Respectfully submitted,

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CERTIFICATE OF MAILING

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